



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

September 25, 2002

MEMORANDUM

SUBJECT: Office of Inspector General Recommendations Concerning RCRA Corrective Action Environmental Indicators

FROM: Stephen F. Heare, Director /s/  
Permits and State Program Divisions  
Office of Solid Waste

TO: RCRA Senior Policy Advisors  
Regions I-X

At the request of the Office of Inspector General, I would like to reiterate a number of important messages concerning our RCRA Corrective Action Environmental Indicators (EIs), most of which were conveyed in the September 29, 2000 Office of Inspector General (OIG) Audit Report titled, "RCRA Corrective Action Focuses on Interim Priorities - Better Integration with Final Goals Needed." For additional background or clarification, I urge you to access that report at [http://www.epa.gov/oigearth/reading\\_room/list900/rcraaction.pdf](http://www.epa.gov/oigearth/reading_room/list900/rcraaction.pdf), and feel free to direct your questions to Guy Tomassoni of my staff at 703/308-8622.

- ✓ EI documentation should include a clear rationale written to the maximum extent possible in easy to understand plain language, and with effective reference(s) (e.g., document identification, date and page numbers) that collectively support the answers given to individual EI questions and the overall EI determination.
- ✓ As conditions warrant and as resources allow, EPA and State officials responsible for overseeing corrective action should ensure that past EI determinations continue to reflect current conditions, and any changes to an EI determination are reflected in EPA's national RCRAinfo database.
- ✓ To improve accuracy in communicating when a particular EI determination was made, the date reported in our RCRAinfo database should be the same date reported next to the signature of the government official on the completed EI form.
- ✓ Completed EI forms should be accessible via the Internet. Links to Regions that currently post completed forms are found at <http://www.epa.gov/epaoswer/hazwaste/ca/eis.htm>.

- ✓ While we do not currently have an ecologic environmental indicator, government officials and interested stakeholders should be aware that our existing Migration of Contaminated Groundwater Under Control EI has an eco-protection component for situations where contaminated groundwater is discharging to a surface water body. Furthermore, we have two efforts underway to develop additional guidance concerning groundwater/surface water interaction and ecologic protection measures (drafts versions of both documents are expected this fall).
- ✓ To help in our efforts to evaluate EIs, facility representatives and/or their consultants can certainly conduct their own EI evaluations and even complete and submit EI forms; however, the actual EI determinations are made by the overseeing EPA or State official as documented with their signatures and dates on the EI form.
- ✓ In response to EPA's Superfund Program now implementing two site-wide environmental indicator measures that are similar to the RCRA Corrective Action EIs, it is important that we demonstrate good cross-program coordination for the approximately 50 sites nationwide that are being addressed by both RCRA and Superfund authorities. To this end, project managers overseeing cleanups at RCRA facilities that overlap to some degree with a Superfund site should document in the appropriate rationale section(s) of the EI forms that they have coordinated with other EPA or State programs involved with the site.<sup>1</sup>
- ✓ Along with considering other routes of potential exposure, evaluating our Human EI should involve ensuring that subsurface contaminated vapors do not negatively impact the quality of air inside overlying buildings. A draft guidance that will provide practical and scientifically defensible direction on how to evaluate this potential exposure pathway is expected later this summer or early fall.
- ✓ My last and perhaps most important message is that as important as our EIs are to the program, we can't lose sight of the fact that they are interim milestones en route toward completing cleanups and revitalizing corrective action facilities. We have already begun discussing what our next round of performance-based measures might look like, and we expect to issue new guidance concerning completion of corrective action this fall.

Thank you once again for the accomplishments we've made to date and all the hard work and support we will need to meet our 2005 goals.

cc: Matt Hale, OSW  
Susan Bromm, OSRE  
Dana Tulis, OERR  
James Woolford, FFRRO  
Tina Lovingood and Carolyn Copper, OIG  
Tom Kennedy, ASTSWMO

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<sup>1</sup> EPA's Superfund Program is currently developing guidance concerning the implementation of environmental indicators at Superfund sites. That guidance is anticipated to include additional recommendations concerning cross-program coordination for sites being addressed by both RCRA and Superfund authorities.